

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION  
Case No. 21-CV-667**

**MOHAMED ALASSANE KARZO**

**Plaintiff**

**v.**

**MATADOR RECORDS, Inc.,  
DOMINO PUBLISHING COMPANY of  
AMERICA, Inc., REDEYE, Inc.,  
M'DOU MOCTAR,  
MAHAMADOU SOULEYMANE,  
MICHAEL COLTUN,  
AHMOUDOU MADASSANE, and  
SOULEYMANE IBRAHIM**

**Defendants**

**PETITION FOR CERTIFICATION  
AND MOTION TO STAY**

**COMES NOW** Plaintiff, by and through counsel, pursuant to 28 U.S.C. § 1292(b) and in response to the Court's Order entered September 14, 2022 (Doc.37) respectfully submits this petition for certification of the interlocutory order, and for a stay of the proceedings.

In the Order this Court granted the Defendants' Rule 12(c) motion based on its conclusion that all Defendants' copyright infringements such as publication and distribution were traceable to Mahamadou Souleymane's performing Mr. Karzo's music prior to Mr. Karzo's registration of his copyright. Mr. Karzo will demonstrate to the Court that, pursuant to 28 USC § 1292(b), this "order involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the order may materially advance the ultimate termination of the litigation." *Id.*

Pursuant to Local Rule 7.3 Plaintiff will submit a memorandum of law concomitant with this motion.

**WHEREFORE** the Plaintiff respectfully petitions this Court for certification of an interlocutory appeal to the Fourth Circuit Court of Appeals on the Order, to stay this action until the resolution of the appeal, and for any other relief this Court finds just and proper.

**TODAY** is September 26, 2022.

**COLLUM & PERRY**

By: /s/ M. Shane Perry  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically via CM/ECF with the United States District Court, Middle District of North Carolina, with notification being sent electronically to all counsel of record.

**TODAY** is September 26, 2022.

/s/ M. Shane Perry  
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